

REMARKS

Claims 1 to 6 remain rejected under 35 U.S.C. §102(b) as being anticipated by the U.S. Patent No. 6,092,196 to Reiche (hereinafter, Reiche).

Claims 1 to 6 have been amended to further clarify said randomized ID as a randomized user ID. Applicants respectfully note that the claims are to be given their broadest reasonable interpretation consistent with the specification. See MPEP § 2111, 8th Ed., Rev. 3, pg. 2100-46, (August 2005). The specification defines the randomized ID as being associated with a user so as to protect the user's identity. See for example, Applicants' specification, paragraph 118.

Accordingly, when the claims are read as required by the MPEP § 2111, this should be the interpretation used. However, to avoid discussion about whether the Examiner is being requested to read limitations into the claims, Applicants have amended the claims as indicated above. Applicants respectfully submit that since the amendment simply states explicitly the interpretation that should be used according to the MPEP that the amendments do not affect the patentability of the claims.

In the Advisory Action dated September 14, 2005, the Examiner set out the bases for maintaining the rejections in part as:

. . . The reference, Reiche teaches that the reference comprises a peer group ID and a randomized ID because the resource includes many IDs to make sure that the accessing client is authorized such as the random ID initialized for the resource (Column 8, lines 65-66, random transaction ID) and the peer group ID which can just be identifier to locate and identify the resource (Column 10, lines 50-63). The reference Reiche also teaches that a key is used to allow access to a resource (Column 9, lines 3-6).

Applicants respectfully traverse the rejection of Claim 1. Applicants thank the Examiner for the clarification on the basis of the rejection. Claim 1, as amended, recites in part:

said rights key credential comprising:

at least one key to provide access to a resource on said data communications network; and

a resource identifier, said resource identifier comprising a resource server peer group ID and a randomized user ID, said resource server peer group ID identifying a resource server peer group, said resource server peer group comprising at least one server that maintains a mapping between said randomized user ID and said at least one key, where said randomized user ID is associated with an identity of a user thereby protecting said identity; and

providing access to said resource using said at least one key.

As understood, the rejection identifies the "transaction ID" of Reiche as the "randomized ID" of Claim 1 of the instant application and the private key used in "a simple private key encryption algorithm" of Reiche as the "at least one key" of Claim 1 of the instant application. However, this fails to teach exactly the elements recited in Claim 1 of the instant application.

As quoted above, the Advisory Action cited Column 8, lines 65 - 66 as teaching the "...random ID initialized for the resource." However, the randomized user ID in Claim 1 is not for the resource, but instead the user. Accordingly, the rejection itself demonstrates that Reiche fails to teach the identical invention as recited in Claim 1.

Moreover, Reiche further taught:

When a user is desirous to access a resource on a given customer server, say through HTTP data exchange session, the browser on the user's machine makes a first contact with the customer server. Access to the resource that is being sought is not permitted by the customer server since an access grant control transaction has not yet been

completed, in other words, the customer server does not know if the request made by the user is legitimate. The customer server then causes initiation of the access grant control transaction. The first step is to generate a transaction ID that uniquely identifies the session with the user. That transaction ID is stored in a special URL along with the client IP address, expiry time, check sum etc., its fundamental purpose being to create a unique identifier for the session.

Reiche, Column 4, lines 54 - 77 and Column 5, line 1. Reiche defined a transaction ID as an ID that "uniquely identifies the session with the user" and that its fundamental purpose is to "create a unique identifier for the session". Reiche also defines a user ID (see, for example, Column 9, line 29) and is careful to distinguish between the two IDs. Therefore, the randomized transaction ID is not a randomized user ID, and the rejection has failed to cite any teaching that the user ID of Reiche is randomized. This alone is sufficient to overcome the anticipation rejection of Claim 1.

As quoted above the advisory action further stated:

The reference Reiche also teaches that a key is used to allow access to a resource (Column 9, lines 3 - 6).

This cited section of Reiche taught:

At step 212, a special URL is constructed from the row ID, client ID, transaction ID and a checksum of these three values. This information is then encrypted using a simple private key encryption algorithm, uuencoded and URL encoded to facilitate transmission (step 214). At step 216, the AD issues,

Reiche, Column 9, lines 1 - 6. This does not teach anything specific about the "simple private key." However, this step is performed by an authentication demon (AD) that Reiche describes as being on the located on the customer server (Reiche, Col. 8, lines 50). There is no teaching of a mapping between a randomized user ID and any key in this section or even of a mapping. Thus, the cited section of Reiche failed to teach the at least one key element of Applicants' invention in as complete detail as set out in the claim. This alone is also

sufficient to overcome the anticipation rejection of Claim 1.

Applicants respectfully note that The MPEP requirements for an anticipation rejection include:

. . . "The identical invention must be shown in as complete detail as is contained in the ... claim." . . . The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required.

MPEP § 2131, 8th Ed., Rev. 3, p. 2100-77 (August 2005).

The MPEP clearly sets out that "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." This is a mandatory requirement and failure of a reference to show the elements in as complete detail as is contained in the claim means that the reference fails to anticipate the claim. Any one of the foregoing examples of failure to teach the elements of the instant Application is sufficient to overcome the anticipation rejection. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Applicants respectfully traverse the anticipation rejections of each of Claims 2 through 6.

With respect to Claims 2 through 6, the above comments are incorporated herein by reference. Each of Claims 2 through 6, as amended, recites a randomized user ID, a resource server peer group ID, and at least one key. The cited sections of Reiche failed to teach the foregoing recited elements, as previously discussed. Applicants respectfully request reconsideration and withdrawal of each of the anticipation rejections of Claims 2 through 6, respectively.

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Amdt. dated October 27, 2005

Reply to Advisory Action mailed September 14, 2005

Claims 1 to 6 remain in the application. Claims 1 to 6 have been amended. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on October 27, 2005

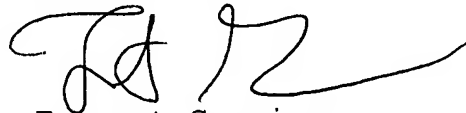


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Date of Signature

Respectfully submitted,



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